



**June 1, 2020**

**VIA ECF**

**U.S.D.J. Vernon Broderick**

United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, NY 10007

**Re: Elgin Turner v. MNRR, et al;**  
**17-Cv-9168 (VSB)**

Dear Judge Broderick:

We represent the Plaintiff, Elgin Turner, in this matter. I write pursuant to Your Honor's Individual Rule #1.G. to respectfully request a 7-day extension of the remaining deadlines related to Defendant's pending FRCP 56 motion for summary judgment. Defendants consent to this request.

This request would push back the current deadlines for Plaintiff to file his opposition papers from Monday, June 8, 2020 to Monday, June 15, 2020 and Defendants' deadline to file their reply papers from Monday, June 22, 2020 to Monday, June 29, 2020.

This is the first such request for an extension of these deadlines. The reason for this request is that Plaintiff's counsel learned last Friday, May 29, 2020 of the death of a good personal friend from complications of COVID-19, and this request is so that counsel may have time to mourn and grieve the loss of his friend.

Plaintiff thanks the Court for its consideration in this matter.

Sincerely yours,

**DEREK SMITH LAW GROUP, PLLC**

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# Attachment A